

4001 Rodney Parham Road  
Little Rock, AR 72212-2442



Hart, Chandler & Associates, PLLC  
8028 Cantrell Road, Suite 201  
Little Rock, AR 72227

July 14, 2010

To: Hart, Chandler & Associates, PLLC

In accordance with the requirements found in Section 64.1320(d) of the Commission's Rules, Windstream Concord Telephone, Inc. (the Company) makes the following assertions regarding its compliance with the Payphone Service Provider (PSP) compensation procedures. These assertions are accurate through October 27, 2009, after which time, the Company entered into an alternative compensation arrangement pursuant to Section 64.1310(a) that relieves it of its tracking system obligation.

1. The Company's procedures accurately track calls to completion.
2. The Company has a person or persons responsible for tracking, compensating, and resolving disputes concerning payphone completed calls.
  - a. Michael Farzley, 4001 Rodney Parham Rd., Little Rock, AR 72212, (501) 748-5352, [Michael.a.farzley@windstream.com](mailto:Michael.a.farzley@windstream.com)
  - b. The Company does not use a Clearinghouse to process payphone compensation for this market.
3. The Company has effective data monitoring procedures
  - a. The Company maintains a data warehouse containing detailed call records, which can be utilized for payphone compensation. Data is retained for 13 months, after which it is stored via tape that can be accessed as needed.
  - b. Reports are generated quarterly and reviewed for accuracy.
4. The Company adheres to established protocols to ensure that any software, personnel or any other network changes do not adversely affect its payphone call tracking ability.
5. The Company has created a compensable payphone call field by matching call detail records against payphone numbers provided by PSPs.

6. The Company has procedures to incorporate call data into required reports. Tracked items include, but are not limited to:
  - a. Payphone number
  - b. Toll-free or access code number
  - c. Carrier Code (CIC) of completing carrier
  - d. Usage period of call
  - e. Payphone identifier
7. The Company has implemented procedures and controls needed to resolve payphone compensation disputes.
8. The independent third party auditor can test all critical controls and procedures to verify that errors are insubstantial.
9. The Company has in place adequate and effective business rules for implementing and paying payphone compensation including rules to:
  - a. Identify calls originated from payphones by using reports provided by PSPs and clearing houses that include payphone numbers that could generate compensable calls.
  - b. Identify compensable payphone calls. Call records with an answered call supervision are selected that contain an originating payphone number and that terminate to toll-free or access code numbers. These records are then matched against the PSP and clearinghouse files.
  - c. Identify incomplete or otherwise noncompensable calls:
    - i. Calls with an unanswered call supervision are incomplete calls and are therefore noncompensable.
    - ii. Dial around 101-xxxx calls are unable to be made from payphones and are therefore noncompensable.
  - d. Determine the identities of the PSP to which compensation is owed:
    - i. The Company reviews the notarized affidavits submitted attesting that a PSP is eligible for compensation and prepares its compensation accordingly.

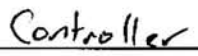
ii. The following information is obtained from the PSPs in order to provide compensation:

1. Payphone numbers owned by the PSP
2. Current address and contact number for the PSP
3. Email address to whom quarterly data should be sent

In summary, Windstream Concord Telephone, Inc. has in place the appropriate procedures and is in compliance with the FCC's Rules found in Section 64.1320.

Sincerely,

  
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Signature

  
\_\_\_\_\_  
Title